UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

In re:)	Chapter 9
CITY OF DETROIT, MICHIGAN,)	Case No. 13-53846
Debtor.)	Judge Thomas J. Tucker
)	

FIFTH STIPULATION FOR EXTENSION OF FILING RESPONSE TO CITY OF DETROIT MOTION, DOCKET No. 13126, FOR CLAIMANTS AFSCME (CLAIM NUMBER 2958) AND THE COALITION OF DETROIT UNIONS (CLAIM NUMBER 2851)

The City of Detroit, Michigan ("City"), AFSCME Council 25 and Its Affiliated Detroit Locals, on behalf of themselves and their affiliated locals, officers, agents, employees and members ("AFSCME") and the Coalition of Detroit Unions, on behalf of itself and its members and their officers, agents, employees and members ("Coalition") stipulate and agree as follows:

- 1. On September 17, 2019, the City of Detroit filed a motion concerning the implementation of distributions of certain B Notes to holders of allowed Class 14 claims, for the City's Plan of Adjustment.
- 2. Claimants AFSCME and the Coalition have two separate allowed claims, which are entitled to B Notes, pursuant to an Order of this Court.

3. On October 30, 2019, the parties filed a stipulation and proposed

order with this Court requesting an additional two days to finalize a proposed

order.

4. While trying to finalize the documents over the last two days, the

parties now believe that certain changes are needed to the stipulation and order due

to an unresolved issue. Although the parties are optimistic that agreement will be

reached, this issue requires the input of advisors to AFSCME and the Coalition and

it is anticipated that it may take one week to resolve this issue.

5. To the extent the issue cannot be resolved, the parties agree that

AFSCME and the Coalition must file objections to the motion on or before

November 11, 2019, and that a hearing on the Motion may be held at the next

scheduled hearing in the City's bankruptcy case, which is November 20, 2019, at

1:30 p.m., subject to the availability of this Court.

Dated: November 1, 2019

CITY OF DETROIT LAW DEPARTMENT

By: /s/ Charles N. Raimi

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Dated: November 1, 2019

CITY OF DETROIT

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Dated: November 1, 2019 By: /s/ Richard G. Mack, Jr.

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EXHIBIT 1

UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

In re:

Bankruptcy Case No. 13-53846

City of Detroit, Michigan,

Judge Thomas J. Tucker

Debtor.

Chapter 9

FIFTH ORDER APPROVING STIPULATION FOR EXTENSION OF FILING RESPONSE TO CITY OF DETROIT MOTION, DOCKET No. 13126, FOR CLAIMANTS AFSCME (CLAIM NUMBER 2958) AND THE COALITION OF DETROIT UNIONS (CLAIM NUMBER 2851)

This matter having come before the Court on the Stipulation Between the City of Detroit, AFSCME Council 25 and Its Affiliated Detroit Locals, and the Coalition of Detroit Unions for Entry of an Order Approving an Extension of Time for Claimants' filing of response to City Motion concerning a process for the implementation of distributions of B Notes (Docket No 13126) ("Stipulation", Docket No. **), the Court being fully advised in the premises, and there being good cause to grant the relief requested, and the Court finding that the proposed stipulation is fair and equitable and is in the best interest of the City, AFSCME and the Coalition, and other creditors of the City,

IT IS HEREBY ORDERED THAT:

- 1. The Stipulation is approved as set forth in this Order.
- 2. AFSCME may respond to the City's Motion at Docket No. 13126, on or before November 11, 2019.
- 3. The Coalition may respond to the City's Motion at Docket No. 13126, on or before November 11, 2019.